

Tisa, Kimberly

From: Tisa, Kimberly
Sent: Tuesday, February 10, 2015 1:42 PM
To: 'John Cressey'
Cc: nick.hodgkins.maine.gov; Tisa, Kimberly
Subject: FW: Long Term Monitoring - Maine Energy
Attachments: Long Term Monitoring - Maine Energy

John:

This is written in response to a proposed modification to your PCB remedial plan to address PCB contamination at the Maine Energy (MERC) site in Biddeford. In June 2014 EPA approved a plan for the site which included removal of PCB-contaminated soils with > 25 ppm and installation of a TSCA cap in accordance with 40 CFR 761.61(a)(7).

As indicated in your September 17, 2014 modification request, PCB-concentrations > 25 ppm remain in structural locations along the railroad track retaining wall and along the river retaining wall that cannot be removed due to structural considerations. The modification proposed leaving these concentrations in-place based on the fact that a multi-component cover system would be installed such that the in-place management of > 25 ppm PCBs would not pose an unreasonable risk of injury to health or the environment.

By email dated August 8, 2014, MEDEP stated in part, "the work being done (removal to the extent practicable, capping, deed restrictions) effectively eliminates the risks at the property. Future inspection to insure the integrity of the remedy will be ongoing, with maintenance occurring if/as necessary." MEDEP also concluded that groundwater wells with LT monitoring were not necessary based on the work being done and the infeasibility of installing a gw monitoring well(s) due to physical site constraints.

I also spoke with Nick Hodgkins today on the site. Based on this conversation, there does not appear to be any data indicating that in-place management of the PCBs would present a risk to site users or to the adjacent river.

Accordingly, and in accordance with Condition 18 of the Approval, EPA has no further comments on the proposed modification. However, please be aware that in the event EPA receives any information indicating that the PCBs remaining at the Site are posing an unreasonable risk of injury to health or the environment (e.g., information that PCBs remaining at the site are migrating from the site into the river, or that the cap is not protective, etc). EPA reserves its rights to require additional remedial measures at the Site.

Please ensure that the final completion report addresses this modification.

Should you have any further questions, please feel free to contact me.

Kimberly N. Tisa, PCB Coordinator (OSRR07-2)

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Tisa, Kimberly

From: John Cressey <jcressey@ces-maine.com>
Sent: Monday, August 18, 2014 11:04 AM
To: Tisa, Kimberly
Cc: ken.robins@casella.com; nick.hodgkins.maine.gov; Toni King; Brian.Oliver@Casella.com; Thomas Doyle (tdoyle@pierceatwood.com); Phinney, Brian; David L Schmitt; Keith R. Jacques
Subject: Long Term Monitoring - Maine Energy
Attachments: Long-Term Monitoring for PCB's at MERC, Biddeford; concrete wall near river.jpg; retaining wall near river.jpg; view of retaining wall above the excavation.jpg; Drinking Water.jpg

Kim,

On Monday afternoon, August 11, Nick Hodgkins of MEDEP and I discussed the possibility of placing a monitoring well between the excavation and the river. As you can see from these photographs there isn't really anywhere "downgradient" of the excavation to place a well. The vegetation you see in the photos is growing within the retaining wall structure which is a hodge podge of concrete, granite blocks, and bedrock. As such, there does not appear to be any potential to put a well in this area.

Additionally, as shown on the attached public drinking water map from the Maine Center for Disease Control and Prevention, there are no registered public water wells (red circles) or surface water intakes (pink areas) downgradient (southeast) of the site. The site is zoned industrial-commercial and there are no private drinking water users on or downgradient of the site, nor will there be in the future. Therefore, there does not appear to be a water risk to groundwater users or to public water supplies.

We have also discussed the situation with Brian Phinney, City of Biddeford Environmental Engineer, and Keith Jacques, City of Biddeford Attorney. Biddeford is in agreement with Casella and Nick Hodgkins of the MEDEP that because of the lack of an adequate location for a "downgradient" monitoring well and the minimal risk to groundwater users or to public water supplies, a long term groundwater monitoring plan is not appropriate for this site. (Please see the attached e-mail from Nick Hodgkins with his opinion regarding this.) We propose to complete the cap as required, including sealing any concrete surfaces within the retaining walls, which may exceed cleanup concentrations along the edge of the cap. We will include language in the deed covenant preventing wells of any type to be installed on the property as well as a prohibition on excavation within the capped area, other than for grass, shallow-rooted trees, shrubs, and other plantings consistent with a park or river walk use, provided none of these items disturbs or alters the TSCA-compliant cap.

Please confirm that this approach is acceptable. Thank you.

John K. Cressey, C.G. ♦ Senior Project Manager/Senior Project Geologist
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Tisa, Kimberly

From: nick.hodgkins.maine.gov
Sent: Monday, August 18, 2014 10:09 AM
To: John Cressey
Subject: Long-Term Monitoring for PCB's at MERC, Biddeford

John,

Based on the data and information provided, as well as my knowledge of the site, I do not believe that monitoring wells could be installed in the area of residual PCB contamination because of the physical characteristics and constraints of that area. The retaining walls and granite foundations, the limited area to work in, as well as the mixed nature of the backfill, make success very, very unlikely.

From my perspective, the work being done (removal to the extent practicable, capping, deed restrictions) effectively eliminates the risks at the property. Future inspection to insure the integrity of the remedy will be ongoing, with maintenance occurring if/as necessary.

For these reasons, I do not support the installation of the monitoring wells/long-term groundwater monitoring at the former MERC site.

Let me know if you have any questions.

Thanks,

Nick

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